

# The Honorable Christopher M. Alston

## Chapter 7

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE:  
JASON L. WOEHLE  
Debtor

NO. 18-12299 CMA

**DECLARATION OF MANISH BORDE IN  
SUPPORT OF EX PARTE APPLICATION  
FOR RULE 2004 EXAMINATION**

I, Manish Borde, say:

1. I am an attorney at law admitted to practice before this Court and am the Managing Member of the law firm of BORDE LAW PLLC, 600 Stewart Street, Suite 400, Seattle, WA 98101 (“BORDE LAW”). I have personal knowledge of the facts set forth herein, and am competent to testify to the same.

2. On June 10, 2019, the Court entered its Order approving the employment of BORDE LAW as special litigation counsel for the Trustee. BORDE LAW was retained to investigate and potentially prosecute claims held by the bankruptcy estate against Sacor Financial, Inc.<sup>1</sup> The records sought in the accompanying Ex Parte Application for Rule 2004 Examination are sought in conjunction with evaluating claims against Sacor Financial, Inc. in relation to the judgment that was entered against the Debtor in *Brandt v. Columbia Credit Services, Inc.*, et al., W.D. Wash. Case No. 2:17-cv-00703-RSM.

<sup>1</sup> Dkt. No. 146.

**DECLARATION OF MANISH BORDE IN SUPPORT OF EX PARTE  
APPLICATION FOR RULE 2004 EXAMINATION - 1**

**BORDE LAW PLLC**  
600 Stewart Street, Suite 400  
Seattle, Washington 98101  
(206) 905-6129

I declare under penalty of perjury under the laws of the United States of America that  
the foregoing is true and correct.

4 DATED this 17<sup>th</sup> day of July, 2019.

/s/ Manish Borde  
Manish Borde, WSBA #39503  
BORDE LAW PLLC  
600 Stewart Street, Suite 400  
Seattle, WA 98101  
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[mborde@bordelaw.com](mailto:mborde@bordelaw.com)  
Special litigation counsel for Trustee

**DECLARATION OF MANISH BORDE IN SUPPORT OF EX PARTE  
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## PROOF OF FILING

The undersigned hereby certifies that on July 17, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants.

DATED this 17<sup>th</sup> day of July, 2019.

/s/ Manish Borde  
Manish Borde, WSBA #39503  
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Special litigation counsel for Trustee

**DECLARATION OF MANISH BORDE IN SUPPORT OF EX PARTE  
APPLICATION FOR RULE 2004 EXAMINATION - 3**

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